

FILED

GAMAL SOLOMAN  
21200 Oxnard Ave. Ste.7085  
Woodland Hills, CA, 91367  
gamals99@gmail.com

FEB 04 2025

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY mms  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

GAMAL SOLOMAN,

Plaintiff,

vs.

JUDGE BARBARA M. SCHEPER, et. al.,

Defendants.

} CASE NO.: 2:24-cv-03408-DJC-AC (PS)  
2:24-at-01547  
24CV020200 prior to removal

} OPPOSITION AND OBJECTION TO  
NOTICE OF MOTION AND MOTION TO  
DISMISS BY FEDERAL DEFENDANTS  
AND NOTICE OF ABSOLUTE WILLFUL  
VIOLATION OF ARTICLE III SECTION 1  
AND SECTION 3 BY THE DEFENDANTS.

} DATE: February 26, 205

} TIME: 10:00 a.m.

} CTRM: 26

} JUDGE: Hon. Allison Claire

} (ordered submitted without appearance and  
without argument)

COMES NOW, GAMAL SOLOMAN, the injured party in the above referenced matter, appearing in proper person, do hereby submit this OPPOSITION AND OBJECTION TO NOTICE OF MOTION AND MOTION TO DISMISS BY FEDERAL DEFENDANTS AND NOTICE OF ABSOLUTE WILLFUL VIOLATION OF ARTICLE III SECTION 1 AND SECTION 3 BY THE DEFENDANTS and respectfully request this Court vacate all rulings, decisions, and adjudications made in this matter.

File by Fax

This Notice, Objection, and Opposition is based upon the following facts, including those facts and representations contained in the Declaration submitted herewith:

- As previously set forth on the record, the self-proclaimed attorneys who have appeared, argued, and/or participated in this matter, have been requested to produce the requisite license that would enable them to engage in such activities in the courts of California.
- Those self-proclaimed attorneys have refused to produce the requested license(s), and in fact, cannot produce such license.
- Those self-proclaimed attorneys, are not properly licensed and have no authority to participate in this action—or any legal proceeding for that matter, and therefore lack the requisite authority, and are not qualified, to appear or participate in this matter.
- That there is no factual or legal basis to support the relief requested by the Defendants and the positions advanced are improper and legally untenable.
- That all judges are bound by Article III, Section I, that provides judges “serve during good behavior”.
- That the violation of the US Constitution, the CA Constitution, statutes, and/or failure to comply with court rules, state laws, and legal precedent, is not good behavior.

- That condoning the violation of the US Constitution, the CA Constitution, statutes, and/or failure to comply with court rules, state laws, and legal precedent, is not good behavior, and must not be tolerated or allowed.
- Given the lack of standing of the above-named attorneys, all rulings, decisions, and adjudications made in this matter should, indeed must, necessarily be vacated, set aside and dismissed.
- Moreover, the above-named parties/Defendants, are in default of the action filed with the Superior Court of the State of California, County of Sacramento and the United States District Court, Eastern District of California.
- As detailed herein, the relief sought by the Honorable Judges Johnnie B. Rawlinson, Daniel P. Collins, and Sidney R. Thomas, Karent Scott and federal court personnel Grace Santos and Molly Dwyer is improper, intended to curtail and infringe upon my First Amendment rights, as well as my Due Process Rights, and therefore unconstitutional and void.
- That as a result, the Honorable Judges Johnnie B. Rawlinson, Daniel P. Collins, and Sidney R. Thomas, Karent Scott and federal court personnel Grace Santos and Molly Dwyer not entitled to the relief prayed for, and the tentative ruling and any resulting judgment(s)/order(s) resulting from the underlying motion to strike is void and unenforceable.

Based upon the above facts, Defendant Gamal Solomon opposes and objects to the relief requested by the Honorable Judges Johnnie B. Rawlinson, Daniel P. Collins, and Sidney R. Thomas, Karent Scott and federal court personnel Grace Santos and Molly Dwyer, and to the tentative ruling and any other order/judgment signed by the Hon. Richard K. Sueyoshi, the Hon. Allison Claire, or other judicial officer pertaining to the subject motion to strike and requests of this Court to vacate all prior rulings, decisions, and adjudications, in their entirety.

**NOTICE OF ABSOLUTE WILLFUL VIOLATION OF ARTICLE III  
SECTION 1 AND SECTION 3 BY THE DEFENDANTS**

I, Gamal Solomon will point your case laws are in direct conflict with the Constitution of the United States, Article III of the Constitution states the following “Section 1 The Judges, both of the supreme and inferior Courts, shall hold their Offices during good Behaviour,” and “**Section 3 Treason against the United States, shall consist only in levying War against them, or in adhering to their Enemies, giving them Aid and Comfort. No Person shall be convicted of Treason unless on the Testimony of two Witnesses to the same overt Act, or on Confession in open Court.**

Section 1 talks of good behaviour and to see just how corrupt the judicial office of all named judicial officers named herein and who have participated in the

above named matter(s) can be is in direct conflict and violation of this section of Article III section 1 of Good Behaviour.

This Section 3 in the Constitution includes case law that claims you can be as “Corrupt” as you want as this “Now” become the open Confession in Court as your foundation for a dismissal it doesn’t matter how corrupt no matter how wrong or errs you become.

I well remind this court on the recorded also of the following 18 USC 4  
**18 U.S. Code § 4 - Misprision of felony**

Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.

I, Gamal Solomon am aware of a commission of a felony “Cognizable BY A COURT OF THE UNITED STATES” as it declares in 18 USC 4 , and it further declares if I am aware such commission of a Felony Cognizable BY A COURT OF THE UNITED STATES “ I am to report it to a “JUDGE OR OTHER PERSON OF CIVIL OR MILITARY AUTHORITY” this District Court Judge is being placed on Notice of a willful felony especially as it is explained in your Motion to Dismiss as it states it doesn’t mater how malice or errs or how corrupt, that case law not the law that you are to comply with under Article VI clause 1 &2.

I, Gamal Solomon well again direct your attention to the above statement that before this U.S. district Court is crime to perjury and overthrow of a sworn in Constitutional position has created a felony.

I, Gamal Solomon further point to on the record 18 USC CH 115

#### **18 U.S. Code § 2381 – Treason**

Whoever, owing allegiance to the United States, levies war against them or adheres to their enemies, giving them aid and comfort within the United States or elsewhere, is guilty of treason and shall suffer death, or shall be imprisoned not less than five years and fined under this title but not less than \$10,000; and shall be incapable of holding any office under the United States

#### **18 U.S. Code § 2382 - Misprision of treason**

Whoever, owing allegiance to the United States and having knowledge of the commission of any treason against them, conceals and does not, as soon as may be, disclose and make known the same to the President or to some judge of the United States, or to the governor or to some judge or justice of a particular State, is guilty of misprision of treason and shall be fined under this title or imprisoned not more than seven years, or both.

#### **18 U.S. Code § 2383 - Rebellion or insurrection**

Whoever incites, sets on foot, assists, or engages in any rebellion or insurrection against the authority of the United States or the laws thereof, or gives aid or comfort thereto, shall be fined under this title or imprisoned not more than ten years, or both; and shall be incapable of holding any office under the United States.

#### **18 U.S. Code § 2384 - Seditious conspiracy**

If two or more persons in any State or Territory, or in any place subject to the jurisdiction of the United States, conspire to overthrow, put down, or to destroy by force the Government of the United States, or to

levy war against them, or to oppose by force the authority thereof, or by force to prevent, hinder, or delay the execution of any law of the United States, or by force to seize, take, or possess any property of the United States contrary to the authority thereof, they shall each be fined under this title or imprisoned not more than twenty years, or both.

**18 U.S. Code § 2385 - Advocating overthrow of Government.**

Whoever knowingly or willfully advocates, abets, advises, or teaches the duty, necessity, desirability, or propriety of overthrowing or destroying the government of the United States or the government of any State, Territory, District or Possession thereof, or the government of any political subdivision therein, by force or violence, or by the assassination of any officer of any such government; or

Whoever, with intent to cause the overthrow or destruction of any such government, prints, publishes, edits, issues, circulates, sells, distributes, or publicly displays any written or printed matter advocating, advising, or teaching the duty, necessity, desirability, or propriety of overthrowing or destroying any government in the United States by force or violence, or attempts to do so; or

Whoever organizes or helps or attempts to organize any society, group, or assembly of persons who teach, advocate, or encourage the overthrow or destruction of any such government by force or violence; or becomes or is a member of, or affiliates with, any such society, group, or assembly of persons, knowing the purposes thereof—

Shall be fined under this title or imprisoned not more than twenty years, or both, and shall be ineligible for employment by the United States or any department or agency thereof, for the five years next following his conviction.

If two or more persons conspire to commit any offense named in this section, each shall be fined under this title or imprisoned not more than twenty years, or both, and shall be ineligible for employment by the United States or any department or agency thereof, for the five years next following his conviction.

As used in this section, the terms “organizes” and “organize”, with

respect to any society, group, or assembly of persons, include the recruiting of new members, the forming of new units, and the regrouping or expansion of existing clubs, classes, and other units of such society, group, or assembly of persons.

**18 U.S. Code § 2331 – Definitions**

As used in this chapter—

- (1) the term “international terrorism” means activities that—
  - (A) involve violent acts or acts dangerous to human life that are a violation of the criminal laws of the United States or of any State, or that would be a criminal violation if committed within the jurisdiction of the United States or of any State;
  - (B) appear to be intended—
    - (i) to intimidate or coerce a civilian population;
    - (ii) to influence the policy of a government by intimidation or coercion.

Whereas this is your intent this violate 18 USC 1346.

**18 U.S. Code § 1346 – Definition of “scheme or artifice to defraud”**

For the purposes of this chapter, the term “scheme or artifice to defraud” includes a scheme or artifice to deprive another of the intangible right of honest services.

This becomes a terrorist activity in a open confession in Court under Article III section 3 and in violation of all 18 USC CH 115 as pointed out on record above and whereas you are use self-created case law to commit Treason and the overthrow of your sworn Oath to the Constitution I have the obligations and Duty to make such a report under 18 USC 4 AND 18 USC 2382 as this has become a terrorist act under 18 USC 2331.

I, Gamal direct your attention to the "IOIA: of 1945 International Organizations Immunities Act and to the 14th Amendment you are no longer a Citizen but give up your citizenships under 8 USC 1481.

So if you are going to claim sovereign immunities that clear show you are a terrorist as all people who claim to be sovereign is classified by the FBI as such. The FBI considers sovereign-citizen extremists as comprising a domestic terrorist movement, which, scattered across the United States, has existed for decades,

Sovereign citizens are often confused with extremists from the militia movement. But while sovereign citizens sometimes use or buy illegal weapons, guns are secondary to their anti-government, anti-tax beliefs. On the other hand, guns and paramilitary training are paramount to militia groups.

Sovereign citizens are known to travel the country conducting training seminars SJI. State justice institute, FJC. Federal Judicial Center by and throw a private Association known as the Bar Association.

Your Motion to dismiss clearly claim you are a sovereign and above the law as the law doesn't apply to you no matter how corrupt.

Under the IOIA SEC. 9 if you Claim immunities then you have to give immunities. The privileges, exemptions, and immunities of international organizations and of their officers and employees, and members of their families, suites, and servants, provided for in this title, shall be granted notwithstanding the

fact that the similar privileges, exemptions, and immunities granted to a foreign government, its officers, or employees, may be conditioned upon the existence of reciprocity by that foreign government: Provided, That nothing contained in this title shall be construed as precluding the Secretary of State from withdrawing the privileges, exemptions, and immunities herein provided from persons who are nationals of any foreign country on the ground that such country is failing to accord corresponding privileges, exemptions, and immunities to citizens of the United States.

Whereas you a by legal definition foreign until the 14th amendment and under the IOIA your willful non-compliance to up hold your sworn oath 28 USC 453 and under 454.

**28 U.S. Code § 453 - Oaths of justices and judges.**

Each justice or judge of the United States shall take the following oath or affirmation before performing the duties of his office: "I, \_\_\_\_\_, do solemnly swear (or affirm) that I will administer justice without respect to persons, and do equal right to the poor and to the rich, and that I will faithfully and impartially discharge and perform all the duties incumbent upon me as \_\_\_\_\_ under the Constitution and laws of the United States. So help me God."

**28 U.S. Code § 454 - Practice of law by justices and judges.**

Any justice or judge appointed under the authority of the United States who engages in the practice of law is guilty of a high misdemeanor.

It says nothing that you have absolute immunity in the federal administrative laws as I pointed out on the record.

**Defendants' gross misrepresentations of law and fact:**

- A. Solomon's Complaint States a Claim and any representation(s) by the Defendants to the contrary is a misstatement of fact, law, and the record.
- B. All orders that are void are subject to collateral attack and any representation(s) by the Defendants to the contrary is a misstatement of fact, law, and violative of their duty of candor and sworn oath(s).
- C. There are rights to redress and recovery for violations of the oath(s) of Office and/or Criminal statutes and any representation(s) by the Defendants to the contrary is a misstatement of fact, law, and violative of their duty of candor and sworn oath(s).
- D. The acts and actions of the named Defendants are not barred by absolute judicial immunity and furthermore any representation(s) by the Defendants to the contrary is a misstatement of fact, law, and violative of their duty of candor and sworn oath(s).

You have already stated and claim you are-going to be, absolutely corrupt and I want the record to show just how corrupt the defendants claim to be and if this district court intent to back up and support absolute corruption?

This court filing will be send to President elect Donald J. Trump , new A.G. Pam Bondi, new FBI director Kash Patel and Vice Admiral Christopher French head of JAG and to the Congressional Judicial Committee in DC.

I understand the intent corruption is our policy.

DATED this 3<sup>rd</sup> day of February, 2025.

/s/ Gamal Solomon  
GAMAL SOLOMAN  
21200 Oxnard Ave. Ste.7085  
Woodland Hills, CA, 91367  
gamals99@gmail.com

#### **DECLARATION**

#### **Code of Civil Procedure – Section 425.16 California’s Anti-SLAPP Law**

I, Gamal Solomon will point out the Court / Judge and it Bar member which has failed to prove standing and has violated CCP section 425.16 using their “Political Administrative” position to override “Your” Constitutional requirement to up hold protected rights of this party.

Whereas I am not a member of your BAR my First Amendment right to address a violation/contract violation under a previous Court decision by this Court / Judge and Bar members is not just misconduct or an error but falls under 18 USC CH. 115 SECTION 2381-2385 under a perjure Oath.

I have Copied CCP Section 425.16 below so there is no misunderstanding of

your written policies and administrative regulation.

This clearly show that this Court and its member of the Bar cannot violate the anti-slap code.

As a party of interest and the victim in this case I have every right to address the abuse and the theft of my property and how the CCP has been misused to swindle me out of what has been given to me under a divorce decree.

**Code of Civil Procedure – Section 425.16.**

- (a) The Legislature finds and declares that there has been a disturbing increase in lawsuits brought primarily to chill the valid exercise of the constitutional rights of freedom of speech and petition for the redress of grievances. The Legislature finds and declares that it is in the public interest to encourage continued participation in matters of public significance, and that this participation should not be chilled through abuse of the judicial process. To this end, this section shall be construed broadly.
- (b) (1) A cause of action against a person arising from any act of that person in furtherance of the person's right of petition or free speech under the United States Constitution or the California Constitution in connection with a public issue shall be subject to a special motion to strike, unless the court determines that the plaintiff has established that there is a probability that the plaintiff will prevail on the claim. (2) In making its determination, the court shall consider the pleadings, and supporting and opposing affidavits stating the facts upon which the liability or defense is based. (3) If the court determines that the plaintiff has established a probability that he or she will prevail on the claim, neither that determination nor the fact of that determination shall be admissible in evidence at any later stage of the case, or in any subsequent action, and no burden of proof or degree of proof otherwise applicable shall be affected by that determination in any later stage of the case or in any subsequent proceeding.
- (c) (1) Except as provided in paragraph (2), in any action subject to subdivision (b), a prevailing defendant on a special motion to strike shall be entitled to recover his or her attorney's fees and costs. If the court finds that a special

motion to strike is frivolous or is solely intended to cause unnecessary delay, the court shall award costs and reasonable attorney's fees to a plaintiff prevailing on the motion, pursuant to Section 128.5. (2) A defendant who prevails on a special motion to strike in an action subject to paragraph (1) shall not be entitled to attorney's fees and costs if that cause of action is brought pursuant to Section 6259, 11130, 11130.3, 54960, or 54960.1 of the Government Code. Nothing in this paragraph shall be construed to prevent a prevailing defendant from recovering attorney's fees and costs pursuant to subdivision (d) of Section 6259, 11130.5, or 54690.5.

- (d) This section shall not apply to any enforcement action brought in the name of the people of the State of California by the Attorney General, district attorney, or city attorney, acting as a public prosecutor.
- (e) As used in this section, "act in furtherance of a person's right of petition or free speech under the United States or California Constitution in connection with a public issue" includes: (1) any written or oral statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law, (2) any written or oral statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law, (3) any written or oral statement or writing made in a place open to the public or a public forum in connection with an issue of public interest, or (4) any other conduct in furtherance of the exercise of the constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest.
- (f) The special motion may be filed within 60 days of the service of the complaint or, in the court's discretion, at any later time upon terms it deems proper. The motion shall be scheduled by the clerk of the court for a hearing not more than 30 days after the service of the motion unless the docket conditions of the court require a later hearing.
- (g) All discovery proceedings in the action shall be stayed upon the filing of a notice of motion made pursuant to this section. The stay of discovery shall remain in effect until notice of entry of the order ruling on the motion. The court, on noticed motion and for good cause shown, may order that specified discovery be conducted notwithstanding this subdivision.
- (h) For purposes of this section, "complaint" includes "cross-complaint" and

“petition,” “plaintiff” includes “cross-complainant” and “petitioner,” and “defendant” includes “cross-defendant” and “respondent.”

- (i) An order granting or denying a special motion to strike shall be appealable under Section 904.1.
- (j) (1) Any party who files a special motion to strike pursuant to this section, and any party who files an opposition to a special motion to strike, shall, promptly upon so filing, transmit to the Judicial Council, by e-mail or facsimile, a copy of the endorsed, filed caption page of the motion or opposition, a copy of any related notice of appeal or petition for a writ, and a conformed copy of any order issued pursuant to this section, including any order granting or denying a special motion to strike, discovery, or fees. (2) The Judicial Council shall maintain a public record of information transmitted pursuant to this subdivision for at least three years, and may store the information on microfilm or other appropriate electronic media.

This Court and it's Court officers are on notice that I have been sending all my paperwork to the Military JAG office and if what has been declared is correct that when Mr. Trump takes office that there may be a roundup of corrupt judicial officials, and I assure you I put your name on this list for your unconstitutional action.

Dated this 3<sup>rd</sup> day of February, 2025.

/s/ Gamal Solomon  
GAMAL SOLOMAN  
21200 Oxnard Ave. Ste.7085  
Woodland Hills, CA, 91367  
gamals99@gmail.com

**CERTIFICATE OF SERVICE**

I, Gamal Soloman does hereby certify that on the 3<sup>rd</sup> day of February, 2025, service of a true and correct copy of the foregoing OPPOSITION AND OBJECTION TO NOTICE OF MOTION AND MOTION TO DISMISS BY FEDERAL DEFENDANTS AND NOTICE OF ABSOLUTE WILLFUL VIOLATION OF ARTICLE III SECTION 1 AND SECTION 3 BY THE DEFENDANTS was duly made on the individual/entity herein by causing a true copy thereof to be filed and/or served using the address and email identified below.

ROB BONTA, Esq.  
Attorney General of California  
CATHERINE WOODBRIDGE, Esq.  
Supervising Deputy Attorney General  
JULIO A. HERNANDEZ, Esq.  
Deputy Attorney General  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
[Julio.Hernandez@doj.ca.gov](mailto:Julio.Hernandez@doj.ca.gov)  
Attorneys for Defendant Jessica Youngsmith.

Rachel R. Davidson, Esq.  
United States Attorney's Office  
Assistant United States Attorney  
[Rachel.davidson@usdoj.gov](mailto:Rachel.davidson@usdoj.gov)  
Attorney for Defendants Federal Judges/Court Personnel

Todd E. Chvat, Esq.  
T. Robert Finlay, Esq.  
Wright, Finlay & Zak, LLP  
4665 MacArthur Court, Suite 200  
Newport Beach, CA 92660  
[tchvat@wrightlegal.net](mailto:tchvat@wrightlegal.net)

rfinlay@wrightlegal.net

Attorneys for Defendant Todd E. Chvat

Sanford Shatz, Esq.  
McGlinchey Stafford  
18201 Von Karman Avenue, Suite 350  
Irvine, CA 92612-1082  
sshatz@mcglinchey.com

Howard Hall, Esq.  
Kasandra C. Goldbet, Esq.  
Hall Griffin, LLP  
1851 East First Street, 10<sup>th</sup> Floor  
Santa Ana, CA 92705-4054  
hdhall@HallGriffin.com  
kgoldberg@hallgriffin.com  
Attorneys for Defendants Howard D. Hall, Esq.  
And Kasandra C. Goldberg, Esq.

/s/ Gamal Solomon  
GAMAL SOLOMAN  
21200 Oxnard Ave. Ste.7085  
Woodland Hills, CA, 91367  
gamals99@gmail.com